

EXHIBIT “E”

February 5, 2025 Email Response from Defendant’s Counsel

Danielle M Gosciniak

From: Durham, Christopher D. <CDDurham@duanemorris.com>
Sent: Wednesday, February 5, 2025 4:51 PM
To: Kimberly L Russell; Bassani, Elisabeth; Brown, Adam
Subject: RE: Auteri - Subpoena to Testify at a Deposition - Alex Gorsky

Kim:

Please be advised that Duane Morris does not represent Mr. Gorsky, and we are not authorized to accept service of any subpoena on behalf of Mr. Gorsky. If you do indeed serve the subpoena on Mr. Gorsky, send us proof of service promptly following service.

Please be further advised that if you serve the subpoena on Mr. Gorsky, Defendant intends to move to quash the subpoena and/or move for a protective order preventing the deposition of Mr. Gorsky. Plaintiff has no legitimate interest in taking Mr. Gorsky's deposition, as Mr. Gorsky does not have any information that is relevant to Plaintiff's claims or Defendant's defenses. It is clear that Plaintiff's attempt to depose Mr. Gorsky is nothing more than an attempt to harass and embarrass a prominent public figure and major donor to the Doylestown Foundation, and the Foundation itself.

Of course, in the event that any such motion to quash and/or motion for a protective order is successful, we reserve the right to seek an appropriate sanctions reward, including attorneys' fees and costs incurred in responding to the subpoena.

For the purposes of fulfilling our obligation to meet and confer regarding a potential motion for a protective order, please identify the information you believe Mr. Gorsky has that is relevant to Plaintiff's claims or Defendant's defenses in this case. If you would prefer to do so via phone, please let me know your availability over the next few days.

Chris

Christopher D. Durham
Partner

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From: Kimberly L Russell <krussell@kaplaw.com>

Sent: Wednesday, February 5, 2025 1:54 PM

To: Durham, Christopher D. <CDDurham@duanemorris.com>; Bassani, Elisabeth <EBassani@duanemorris.com>; Brown, Adam <ADBrown@duanemorris.com>

Subject: Auteri - Subpoena to Testify at a Deposition - Alex Gorsky [IMAN-IMAN_BB.FID667665]

Good afternoon Chris, Liz, and Adam,

Attached is a Subpoena which I intend to issue for service today to Alex Gorsky for a deposition (no documents requested) in my office on February 12, 2025 beginning at 9:30a.m. If you will be representing Mr. Gorsky and/or are able to accept service on Mr. Gorsky's behalf, please so advise me. Thank you, and I will see you tomorrow.

Kim Russell

Kimberly L. Russell, Esquire

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